



WESTERN PEANUT GROWERS ASSOCIATION, INC.

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July 5, 2005

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Docket Clerk
Marketing Order Administration Branch
Fruit and Vegetable Programs
Agricultural Marketing Service
U. S. Department of Agriculture
1400 Independence Avenue, S.W.
STOP 0237
Washington, DC 20250-0237

RE: Comments on Proposed Rule – Change in Minimum Quality Handling
Standards for Domestic and Imported Peanuts Marketed in the United States;
Docket Number FV05-996-2PR, June 21, 2005, Federal Register Vol. 70, No.
118, pp. 35562-35565/

I am submitting these comments on behalf of the Western Peanut Growers Association, a not-for-profit trade association that represents the producers of over 75% of the peanuts grown in Texas. We appreciate the opportunity to provide comments on USDA's proposed rule for "high moisture" grading of farmers stock peanuts. We support the adoption of the rule as it was recommended by the Peanut Standards Board. We believe it will give peanut farmers added flexibility in marketing their peanuts as well as promoting greater efficiency in the marketing system.

The proposed rule would change the peanut quality standards to require that domestic and imported peanuts be dried to 18% moisture or less prior to inspection and to 10.49% or less prior to storing or milling. The increase in the level of moisture content at inspection as recommended by the Peanut Standards Board will allow the industry the flexibility to develop new drying technologies, thereby increasing handling efficiencies and reducing costs to the peanut industry.

We are grateful for the willingness of USDA to work with the industry and the Peanut Standards Board to initiate this change, and we urge the Department to move expeditiously toward the issuance of a final rule.

Sincerely,

Ted Higginbottom